

Spectrum Health suggests that the language in the proposed Nursing Home Bed CON Standards found in Section 6(1)(A)(i-vii), and all other similar sections in the proposed standards, be replaced with some combination of the following criteria:

- I. A state enforcement action resulting in a license revocation, reduced license capacity, or receivership.
- II. A filing for bankruptcy.
- III. Termination of a medical assistance provider agreement initiated by the Department or licensing and certification agency in another state.
- IV. Listing as a Special Focus Facility in Michigan or any other state
- V. Poor consumer satisfaction survey outcomes using a specified nationally recognized survey tool,
- VI. Poor employee satisfaction survey outcomes using a specified nationally recognized survey tool.
- VII. Outstanding debt obligation to the state of Michigan for quality assurance assessment program or civil monetary penalties.

Clearly, these criteria need to be quantified through the work group process scheduled for January 2008. Spectrum Health looks forward to providing constructive input into that process.